

1 John V. Picone III (State Bar No. 187226)
Jennifer S. Coleman (State Bar No. 213210)
2 Christopher A. Hohn (State Bar No. 271759)
HOPKINS & CARLEY
3 A Law Corporation
The Letitia Building
4 70 South First Street
San Jose, CA 95113-2406
5

mailing address:

6 P.O. Box 1469
San Jose, CA 95109-1469
7 Telephone: (408) 286-9800
Facsimile: (408) 998-4790
8

9 Attorneys for Non-Party
VELODYNE LIDAR, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 v.

16 UBER TECHNOLOGIES, INC.,
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-CV-00939-WHA

**DECLARATION OF ALEX KORZH IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
MOTION FOR SUMMARY JUDGMENT
AND EXHIBITS THERETO [DKT. NO.
1419]**

Date: September 20, 2017
Time: 8:00 a.m.
Dept: 8, 19th Floor
Judge: Hon. William Alsup

Trial Date: October 10, 2017

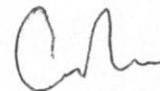
1 I, Alex Korzh declare as follows:

2 1. I am an employee of Velodyne LiDAR, Inc., ("Velodyne"), a third party to the
3 above captioned action. I am the General Counsel at Velodyne.

4 2. I have reviewed the Velodyne information that I understand that Defendants' have
5 moved the Court to seal in their Defendants' Administrative Motion to File Under Seal Portions
6 of Their Motion for Summary Judgement and Exhibits Thereto ("Defendants' Motion to Seal")
7 [Docket No. 1419] from public inspection and/or access pursuant to the Court's rules for filing
8 such information.

9 3. The Velodyne information subject to Defendants' Motion to Seal has significant
10 economic value from not being generally known and has been subject to reasonable efforts to
11 maintain its secrecy. The information has been designated Highly Confidential – Attorney's Eyes
12 Only pursuant to the operable Protective Order. It is an important Velodyne trade secret.
13 Specifically, the identity, characteristics, use, supplier and configuration of the referenced
14 components gives Velodyne a competitive advantage in terms of the system's performance and
15 other material characteristics over its competitors. Public disclosure would harm Velodyne's
16 competitive position in the marketplace and would have adverse effects on the Company
17 generally.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct and that this declaration was executed on September 5, 2017, at San
20 Jose, California.

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22 _____
23 Alex Korzh
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